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June 2, 1997

Mr. William F. Caton  
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1919 M Street, N.W., Room 222  
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Subject: Telephone Number Portability  
CC Docket No. 95-116

Dear Mr. Caton:

Enclosed please find the original, eighteen copies, and a diskette of the the General Services Administration's Comments for filing in the above-referenced proceeding.

Sincerely,

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Senior Assistant General Counsel  
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**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY**

In the Matter of  
Telephone Number Portability

CC Docket No. 95-116

**COMMENTS OF THE  
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**June 2, 1997**

## **Summary**

As a major end user, GSA is convinced that number portability is critical for open competition to develop. GSA recommends that the Commission adopt the standards proposed by the North American Numbering Council on April 25, 1997, since they should help to ensure that number portability develops efficiently throughout the nation. GSA also recommends that the Commission initiate a proceeding to develop national guidelines concerning other facets of competitive local telecommunications, including dialing parity, the availability of interconnection facilities, coordination of repair activities, and access to operations support systems.

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**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of  Telephone Number Portability
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CC Docket No. 95-116

**COMMENTS OF THE  
GENERAL SERVICES ADMINISTRATION**

The General Services Administration ("GSA"), on behalf of the Federal Executive Agencies ("FEAs"), submits these Comments in response to the Commission's Public Notice released May 2, 1997, requesting comments and replies on recommendations by a Federal advisory committee for national standards to implement local number portability.

**I. INTRODUCTION**

Pursuant to Section 111(a) of the Federal Property and Administrative Services Act of 1949, as amended, 40 U.S.C. 759(a)(1), GSA is vested with the responsibility to represent the customer interests of the FEAs before Federal and state regulatory agencies. The FEAs are substantial users of interexchange and local telecommunications services throughout the nation. From this perspective, GSA has consistently supported the Commission's efforts to bring the benefits of competitive telecommunications markets to all consumers.

On June 27, 1996, the Commission adopted its First Report and Order and Further Notice of Proposed Rulemaking in the present docket.<sup>1</sup> In this order, the Commission addressed implementation of the requirements in the Telecommunications Act of 1996 for telephone number portability.<sup>2</sup> Also, the Commission directed the North American Numbering Council ("NANC") to select independent entities to serve as local number portability administrators ("LNPAs") in their respective regions. In addition, the Commission directed NANC to formulate recommendations concerning the duties of these administrators, as well as the location of regional data hubs and the technical specifications for regional databases.

GSA has previously submitted comments in this proceeding to provide the Commission with the perspective of a major end user on issues concerning local number portability.<sup>3</sup> GSA believes that the ability to maintain the same telephone number with changes in local carrier, type of service, or service location is a necessary feature of local telephone service in a competitive environment. Any requirement to change numbers will be a significant deterrent to customers who wish to compare competing local exchange carriers ("LECs"), or to select new telecommunications services.

On April 25, 1997, NANC submitted recommendations to the Commission for uniform number portability standards. GSA recommends that the Commission adopt these standards because they will help to bring the benefits of open competition to users throughout the nation. GSA also recommends that the Commission initiate a

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<sup>1</sup> Telephone Number Portability, First Report and Order and Notice of Proposed Rulemaking, 11 FCC Rcd 8352 (1996) ("First Report and Order").

<sup>2</sup> Telecommunications Act of 1996, Pub. L. 104-104, codified at 47 U.S.C. 151 *et. seq.* ("1996 Act").

<sup>3</sup> Comments of the General Services Administration, September 12, 1995; Reply Comments of the General Services Administration, October 12, 1995; and Comments of the General Services Administration, August 16, 1996.

proceeding to develop national guidelines concerning other facets of competitive local telecommunications, as described in these Comments.

## **II. BENEFITS OF NATIONAL STANDARDS ON NUMBER PORTABILITY**

NANC's April 1997 report, which was crafted by the LNPA Technical and Operational Requirements Task Force, includes recommendations for interoperability and network interface standards concerning number portability. Some of the recommendations encompass standards that have already been subject to operational trials. For example, the initial interface specifications were previously employed in a comprehensive Illinois test. Upon completion of this trial, the Task Force revised this document to encompass other state-specific characteristics and proposed that it be used as an overall industry standard.

The Task Force acknowledged that its recommendations are far from complete. However, continued development and testing of local number portability procedures is yielding standards for interfaces that can replace disparate regional approaches. Not only will uniform national standards facilitate the development of full and open competition as envisioned by the 1996 Act, these standards will also result in cost savings, and help to ensure higher quality services for end users.

By adopting NANC's proposed uniform standards, the Commission can help to remove one of the greatest potential barriers to local competition — the requirement to change telephone numbers whenever a consumer obtains service from any provider other than the incumbent LEC. Uniform standards for number portability are particularly important to users such as the FEAs who require local telecommunications services in thousands of communities throughout the nation.

As GSA noted in its September 12, 1995 comments, the Commission's major function concerning number profitability is to ensure that technical specifications are

compatible throughout the nation.<sup>4</sup> GSA urges the Commission to adopt the number portability standards recommended by the Task Force as a significant step towards this goal.

### **III. NEED FOR ADDITIONAL LOCAL SERVICE STANDARDS**

#### **A. Requirements for National Guidelines**

Standards for number portability will go a long way to help local competition develop, but vigorous competition will not develop with these standards alone. Development of the full and open competition promised by the 1996 Act will also require uniform standards for additional facets of local telecommunications. To that end, GSA urges the Commission to convene a proceeding to develop national guidelines for state regulatory authorities to employ in developing standards for dialing parity, availability of interconnection facilities, coordination of repair activities, and access to operations support systems. GSA is convinced that national guidelines are urgently needed in these areas to maintain consistency in standards concerning these subjects that will be developed by state commissions. Uniform standards are particularly important because mergers and market expansions will likely change the mix of service providers significantly in the next few years.

Users must be able to anticipate uniformly high quality services in all states, independent of interconnections or other arrangements between local exchange carriers. As new firms offer new services, standards are needed to allow end users to enjoy the benefits of competition.

Since the Commission instituted the present proceeding in 1995, the FEAs have participated in numerous proceedings before state regulatory agencies to address the rates, terms and conditions for unbundled network elements and

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<sup>4</sup> Comments of the General Services Administration, September 12, 1995, p. 8.



interconnection services. As indicated in the following sections of these comments, the evidence in these cases has demonstrated that the incumbent local exchange carriers have not given sufficient attention to the need for efficient interfaces and cooperation among local carriers.

The carriers' lack of attention to procedures to ensure that end users will receive high quality service in a competitive environment probably results from the rapid pace of proceedings before state commissions pursuant to the 1996 Act. In any event, there is ample justification for national guidelines to remove any potential barriers created by conditions attached to service offerings by incumbent carriers.

In the following sections of these Comments, GSA provides additional information regarding the importance of national guidelines to help state regulatory agencies remove these significant barriers to open competition.

#### **B. Dialing Parity for All Local Services**

The 1996 Act requires all local exchange carriers — incumbents and new entrants — to provide dialing parity to competing firms offering local or interexchange telecommunications services.<sup>5</sup> The legislation also requires all local exchange carriers to provide nondiscriminatory access to telephone numbers, operator services, and directory assistance services without unreasonable dialing delays.

In part because of the level of competition in the message toll markets, most states require dialing parity for interexchange calls. However, the 1996 Act extends the benefits of these dialing procedures to all local calls, including calls for operator services.<sup>6</sup> Notwithstanding this requirement and the nationwide need for dialing parity, there are no uniform standards governing how it should be implemented or how

its effectiveness should be measured operationally in terms of dialing requirements or other parameters.

GSA's experience in proceedings regarding Statements of Generally Available Terms and Conditions filed by Regional Bell Operating Companies with state regulatory authorities indicates that these carriers have not developed specific plans, let alone quantitative standards, for ensuring dialing equality among local service providers. For example, a Statement filed with the Maryland Public Service Commission provides no information describing how the incumbent carrier intends to comply with the statutory requirements for dialing parity.<sup>7</sup> Even if state regulators address such deficiencies in proceedings pursuant to Section 271 of the 1996 Act or through evaluations of proposed interconnection agreements, only national guidelines will provide the framework that will enable states to ensure uniform compliance with the legislative requirements that end users receive the benefits of dialing parity for all types of local calls regardless of their carrier.

C. Availability of Interconnection Facilities

To serve their own customers, facilities-based competitors need efficient interconnections with the incumbent carriers. The law requires that the interconnections offered by an incumbent carrier be "at least equal in quality to that provided by the [incumbent carrier] to itself or to any subsidiary, affiliate, or any other party to which the carrier provides interconnection."<sup>8</sup>

The FCC affirmed the need for equal quality interconnections in its First Report and Order in CC Docket No. 96-98, but the Commission did not establish specific

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<sup>7</sup> Statement of Bell Atlantic – Maryland, dated December 23, 1996, filed in Maryland Case No. 8731, Phase II. See Initial Brief of the United States Department of Defense and All Other Federal Executive Agencies, May 16, 1997, pp. 19-21.

<sup>8</sup> 1996 Act, Section 251(c)(2)(C).

procedures to gauge the quality of interconnected services or facilities.<sup>9</sup> In that proceeding, a major carrier asserted that standards for “equal” quality were not necessary, because state regulators should be able to define “equal” quality in terms of perception by the end user.<sup>10</sup>

From GSA’s perspective as a major end user, definitive standards are necessary. Without standards, incumbent carriers may attempt to limit the quantity of facilities that they will provide in a specific period, attempt to delay provisioning of facilities, or even attempt to terminate interconnections without good cause. Furthermore, if the standards are not generally uniform from state to state, geographically dispersed users — such as the FEAs — will not receive the same level of service quality from all carriers in all states.

In New York state, a major local exchange carrier has obtained approval of a “Bona Fide Request Process” describing the steps that competitors must follow to obtain unbundled network elements or new services for resale.<sup>11</sup> This process fails to define equal quality of service and could severely impede the development of competition in the state.

As an illustration, according to the “Bona Fide Request Process,” the incumbent carrier is not required to acknowledge receipt of the request for interconnection until 10 days after submission. Except in unspecified “extraordinary circumstances,” the incumbent carrier need only provide a “Preliminary Report” within 30 days after receipt of the request. If the incumbent carrier believes that the request is “valid,” the

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<sup>9</sup> First Report and Order, Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96–98, released August 8, 1996 (“Interconnection Order”), paras. 221–225.

<sup>10</sup> *Id.*, para. 223.

<sup>11</sup> NYNEX Statement of Generally Available Terms and Conditions for Interconnection Services, Access to Unbundled Network Elements, Resale Telecommunications Services, and Ancillary Telecommunications Services under Sections 251, 252 and 271 of the Telecommunications Act of 1996, April 13, 1997.

"Preliminary Report" will contain an estimate of the schedule and cost for implementation. Subsequently, but up to several months later, the incumbent carrier is committed to provide a "Detailed Report." This later report will include a "description of each request, the availability, the applicable rates and the installation intervals."

This illustration, which does not fully describe all of the barriers to new competitors, is sufficient to demonstrate that standards are required to prevent incumbent carriers from using their power over the telecommunications infrastructure. The ability to control interconnections almost at will is an enormously powerful anti-competitive tool. Incumbent carriers should not have the authority to control the provision of interconnections to the point where they are a major factor in determining the ability of competitors to offer their own services.

This anti-competitive tool is particularly harmful to business and government users who obtain most of their telecommunications services through contracts with carriers developed through a competitive bidding process. There will be few bidders competing to offer services to end users if firms other than the incumbent carrier cannot obtain interconnections expeditiously or if they cannot be assured that they will be able to maintain interconnections without interruption.

To provide consumers with a minimum level of protection, GSA urges the Commission to establish uniform guidelines concerning the provision of interconnections by incumbent carriers. The guidelines should also address procedures for reviewing all requests to discontinue interconnection arrangements.

D. Coordination of Repair Activities

Local exchange competition will require interconnected carriers to coordinate their activities to restore service to end users. If carriers do not coordinate their efforts, end users like the FEAs will undoubtedly be caught in the middle with one carrier blaming the other as the offending party. To prevent wasteful accusations, all carriers

should be subject to standards that ensure prompt and efficient restoration of service if multiple local exchange carriers are involved in an outage.

Without effective standards, incumbent carriers will also have repeated opportunities to exploit their control of the telecommunications infrastructure and discriminate in assigning resources to service problems. Although discriminatory treatment of interconnected carriers is prohibited by the 1996 Act, it will be difficult to gauge such behavior without uniform guidelines.

Recently, the Commission established a proceeding to consider the application by an incumbent carrier to provide in-region interLATA service in the state of Oklahoma. This proceeding provides an illustration of the problem. In the proceeding, an association of long distance carriers filed comments with the Commission opposing the request by the incumbent carrier. In its comments, the association stated that the incumbent carrier had applied different service restoration standards for customers served through resellers than for its own customers.<sup>12</sup>

In the FEAs' experience, the terms and conditions proposed by incumbent LECs for unbundled network elements and interconnection services to competing carriers have not specified procedures for coordinating repair activities. For example, the proposed Statement of Generally Available Terms and Conditions filed with the District of Columbia Public Service Commission contains only weak commitments that the respective carriers will provide a minimum amount of information to each other and to their customers. The proposed Statement requires both incumbent and competitive carriers to provide their customers with the number to call to restore telephone service in the event of an interruption in service for any reason. In the event a customer mistakenly calls the wrong repair bureau, the company receiving the call will redirect

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<sup>12</sup> CC Docket No. 97-121 "Opposition of the Texas Association of Long Distance Telephone Companies (Texatel)."

the caller to the correct repair bureau courteously and without charge.<sup>13</sup> The Statement does not reference standards previously applicable in a monopoly environment. The Statement also does not require that any disputes between carriers relating to joint maintenance activities be deferred until repairs are made and service is restored to all affected customers.

State regulators must develop standards that will require incumbent carriers to replace such weak commitments with definitive procedures that ensure prompt and efficient restoration of service if multiple local exchange carriers are involved. The standards should address major questions that concern end users such as GSA:

- Will callers have to play “telephone tag” before their problems are resolved?”
- How soon can users expect telephone services to be restored?

The Commission can take a major step in fostering local competition by providing state regulators with comprehensive guidelines for developing standards ensuring that users throughout the nation obtain the same level of service quality from a competing carrier as they expect to obtain from an incumbent. The guidelines should require at a minimum: (1) that the carrier answering the call will stay on the line until the trouble is fixed or until a satisfactory commitment to restore service is given to the customer; (2) that the Commission’s current standards for clearing troubles be maintained; and (3) that any “finger–pointing” or cost recovery issues will be resolved after the repair is made and service is restored.

E. Access to Operations Support Systems

Operations Support Systems (“OSS”) are employed by local exchange carriers to perform ordering, maintenance, billing, and similar functions. The Commission defined OSS as a network element in the Interconnection Order, so that all local

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<sup>13</sup> District of Columbia Public Service Commission Formal Case No. 962, Bell Atlantic – Washington, D.C. Statement of Generally Available Terms and Conditions, Section 18.2.

exchange carriers are required to provide nondiscriminatory access to each of the OSS functions.<sup>14</sup>

Interconnection of competing local carriers requires seamless interfaces for all OSS functions. Because incumbent local exchange carriers control almost all of the telecommunications infrastructure in every region, users will not receive efficient telephone services unless the incumbent carriers provide all interconnected competitors with access to their OSS.

Notwithstanding the legal and practical requirements for access to all OSS, the Commission has received reports describing activities by incumbent carriers that are sluggish at best. For example, an incumbent carrier in Texas did not perform work on competitors' orders for resold services whenever abandoned services were in place, requiring the competitor's customers to apply directly to the incumbent carrier in order to receive service.<sup>15</sup> Also, the incumbent carrier would not provide a competitor with the identify of the customer who previously had service at the same premises.<sup>16</sup> In addition, the incumbent carrier refused to take any action to contact a customer to seek authority to disconnect service.<sup>17</sup>

In other states, there are disputes as to the tests that should be employed to measure whether or not competitors have commercially feasible access. Regulatory authorities in Illinois have addressed this matter in some detail. Specifically, the Illinois Commission Staff defined a commercially feasible level of access as a level "which implies that carriers are able to utilize the [incumbent local exchange carrier's] OSS in a manner sufficient to accommodate the demand of a new LEC's services by

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<sup>14</sup> Interconnection Order, para. 516.

<sup>15</sup> CC Docket No. 97-121, "Opposition of the Texas Association of Long Distance Telephone Companies (Texatel)," p. 3.

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

end users."<sup>18</sup> (emphasis supplied) The Staff accurately noted that for a carrier to effectively compete in the local exchange market, the carrier must be able to offer its services to the general public with the expectation that all service orders will be processed expeditiously.<sup>19</sup>

The Commission can take the important step of providing OSS guidelines to ensure that competitive local exchange markets will develop as rapidly and uniformly as possible. Together with the other guidelines outlined in these comments, GSA believes that guidelines relating to access to OSS will help complete the regulatory framework needed to realize the goals of the 1996 Act.

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<sup>18</sup> Illinois Commerce Commission Docket No. 96-0404, Hearing Examiner's Proposed Order, March 6, 1997, p. 25.

<sup>19</sup> *Id.*



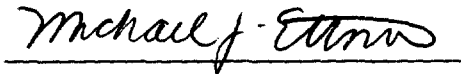
#### **IV. CONCLUSION**

As the agency vested with the responsibility for acquiring telecommunications services for the Federal Executive Agencies, GSA urges the Commission to adopt NANC's recommendations for uniform standards concerning local number portability and to convene a proceeding to establish guidelines for state regulatory authorities to use in developing standards for other facets of competitive local telecommunications.

Respectfully submitted,

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June 2, 1997

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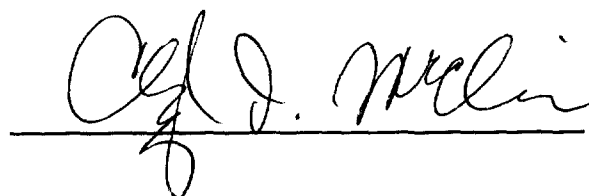
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